

# EXHIBIT 48

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF LESTER  
HOLLINS**

I, LESTER HOLLINS, declare the following under penalty of perjury pursuant to 28 U.S.C. §  
1746:

1. My name is Lester Hollins. I am a 32-year-old Black man. I live in Ridgeland, Mississippi in the Pine Knoll community. I have lived in Ridgeland for four years.
2. In four years I have seen countless Madison County Sheriff's Department roadblocks at the entrance to the community. Pine Knoll is a majority Black community.
3. Typically, two or three officers pull their cars over to the side of the road after dark. They then stand in the middle of the street and stop cars that are entering the community. They then lean into the car and ask for identification.

4. While stopped at a roadblock, I have seen officers stop Black drivers and let white drivers continue through without stopping.

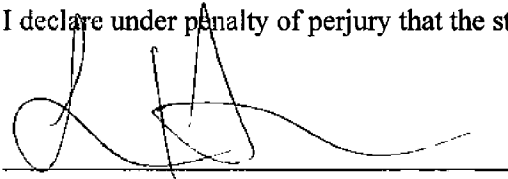
5. On one occasion I asked the MCSD officer why he was stopping Black drivers and waving through white drivers and he told me that the white drivers were "good people."

6. On more than five occasions I have been told to pull my car over to the side of the road. On each occasion I was directed to exit my car. Officers searched my person, reaching inside my clothes and inside my pockets. They also searched the inside of my car and inside of my trunk.

7. I believe that I was stopped and searched without suspicion and for no reason other than I was a Black driver.

8. The MCSD continues to set up roadblocks around my community and I fear I will be targeted again for searches.

I declare under penalty of perjury that the statements above are true and correct.



10/21/17  
Date

# EXHIBIT 49

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF ANTONIO  
HOWARD**

I, ANTONIO HOWARD, declare the following under penalty of perjury pursuant to 28 U.S.C. §  
1746:

1. My name is Antonio Howard. I am a 26-year-old Black man. I have lived in  
Ridgeland for 13 years. I went to Ridgeland High School. I live in the Northbrook apartment  
complex off Pine Knoll Street.

2. Northbrook apartments, along with Bay Meadows apartments and the homes in  
the Country Club neighborhood are only accessed by Pine Knoll Street. I believe this is the only  
predominately black neighborhood in Ridgeland.

3. Madison County Sheriff's Department sets up a roadblock at the entrance to the neighborhood, at the beginning of Pine Knoll Street. They set up the roadblocks as often as every weekend.

4. Typically, two officers will park off the road in the carwash parking lot or on in the parking lot on the other side of the street and turn off their lights. Then they will wave cars down with a flashlight, look in the car with the flashlight and then ask for license and insurance. The officers also searched my car.

5. I have been stopped at the roadblock on Pine Knoll while I was driving close to ten times. Each time I have been stopped I have been directed to exit my car and an officer has patted me down and searched me.

6. On one occasion I was driving my mother's car. I think that because the officer thought it was a nice car he asked me who it belonged to. He then searched it.

7. On two occasions after running my license I was arrested. Once for driving without a license and once because I had failed to appear in court for a traffic ticket.

8. I have also been stopped at roadblocks as a passenger. The officers have asked me for my identification at those stops as well.

9. I believe they are stopping people at the entrance to my neighborhood because this is a black neighborhood.

10. In all the years I have lived and driven in Ridgeland, I have never seen a roadblock set up by MCSD anywhere but at the entrance to my neighborhood.

11. I don't believe they had any reason to stop me as I was driving to or from my house.

I declare under penalty of perjury that the statements above are true and correct.

Antonio Howard

11/25/17

Date

# EXHIBIT 50



**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF DESTINY  
JONES**

I, Destiny Jones, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Destiny Jones. I am 24 years old. I am a Black woman. I was born and raised in Canton, Mississippi. I recently moved to Dallas, Texas, but my family still lives in Canton.

2. I was mistreated by the MCSD. When I complained, I wasn't taken seriously. To my knowledge there was no investigation, and ultimately, nothing happened. The officers I interacted with are dangerous and scary. I am afraid that when I am back in Madison County visiting I will be hurt by them again.

3. In 2016, my brother Aaron lost a wheel while driving on Highway 55. He called 9-1-1 and my husband, John, for help. A state trooper arrived, and the three called for a tow truck.

4. The tow truck took a long time to arrive, so I came to the scene of the accident so John could leave and go to work. However, before John left, a drunk driver hit our cars. We were standing right there, so the driver nearly hit us as well. My car went down into a ravine off the road.

5. It was very frightening. I called my mom because I wanted her there to help me. With our cars damaged, there was no way to get home.

6. Over the next hour, we helped get the drunk driver and his passenger out of the car. We waited for the tow truck and my mom. I believe because the accident was causing traffic, the MCSD also showed up at the scene.

7. Before the MCSD arrived, everything was friendly and relaxed. We had calmed down from a scary accident and were dealing with the tow truck. The tow truck driver asked me to pay him in advance, so I began to walk to my car to get a credit card.

8. As I was walking to my car, the MCSD arrived, and a deputy began screaming and cursing at me not to walk to my car, but also to get off the street and get in my car and wait. I tried to explain that it was my car down in the ravine smoking and that I couldn't get in my car to sit. I also tried to explain I needed my card from my car. He just kept yelling.

9. Finally, my mom told me to just get in her car and wait while the officers figured out what they wanted me to do. I got in her car and waited. The deputy yelled at my mom that he was going to arrest me. I began to cry.

10. Then, the state trooper came over to the car and asked me to get out of the car so I could give him my statement about what happened with the drunk driver. I told him I was afraid and confused. On the one hand he was asking me to get out, but I also had this MCSD officer yelling at me and threatening me if I got out of the car. It was extremely overwhelming.

11. The state trooper opened the door of the car and I kept crying. Then the MCSD officer dragged me out of the car and arrested me. He was extremely forceful – yanking and twisting my arms. I told him he was hurting me, but he didn't care.

12. I couldn't understand why I was being arrested. All I was doing was crying and trying to comply with competing instructions from different officers. But, the officer told me, "I'm taking your ass to jail." My mom begged them to release me and let me go home.

13. My husband John tried to help me. He tried to intervene to get them to stop roughing me up so badly.

14. The MCSD officer walked me over and stood me in front of a MCSD car.

15. Once I was at the car, I turned around and saw that three MCSD officers had tackled John. The MCSD officer who had taken me to the car said, "turn back around or I'll put your face in the pavement." Then he took me and threw me in the back of his car.

16. It took my family a day to get me out of jail.

17. After the incident, I filed a complaint with the MCSD. I thought it was important that the officers' supervisors be aware of the way I was treated.

18. I went to the courthouse and filed a complaint there. No one took my complaint seriously. No one ever called or got in contact with me or my husband (or my mother or brother) to find out what happened or investigate. On the day I was told to come to court, the whole thing took just a few minutes. I was laughed at and my complaint was dismissed.

19. I think I was only treated this way because I am Black. I cannot believe that if a white family was on the side of the street trying to deal with a very upsetting car accident, that they would be screamed and cursed at, roughed up and arrested, and taken to jail.

20. The MCSD treats the people in the Black community different then the people in the white community. And, clearly based on how I was treated, they don't train their officers to deal with people appropriately and with respect.

I declare under penalty of perjury that the statements above are true and correct.

Detia Jones

2/7/18

Date

# EXHIBIT 51

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF LISA LEWIS  
JONES**

I, Lisa Lewis Jones, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Lisa Lewis Jones. I am 46 years old. I am a Black woman. I have lived in Canton, Mississippi for my entire life.
2. I had an extremely upsetting experience with MCSD on Highway 55 with my son, daughter, son-in-law, and brother.
3. In 2016, my son, Aaron was driving on the highway when his wheel came off.
4. As I understand it, he pulled over to the side of the road. He called his brother-in-law, John, for help. He also called the police. A state trooper arrived to help him. The group

waited on the tow truck. Because the tow truck was taking a long time, my daughter, Destiny, arrived to wait with my son so her husband, John, could go back to work.

5. Then, a drunk driver ran into the entire group. The drunk driver hit the state trooper's car, John's car, and Destiny's car. Destiny's car rolled over into the ravine.

6. My children called me and told me what happened. I drove to the highway to wait with them and take care of them.

7. The tow truck driver told Destiny he needed to be pre-paid for the whole group of cars. As she went to the tow truck to pay the driver. An MCSD officer who had recently arrived started screaming and cursing at us to get in our cars and wait.

8. Destiny tried to explain to the MCSD officer that she was walking to the car to pay the tow truck but he kept screaming and cursing to get in her car. She tried to explain she couldn't get in her car because it was in the ravine, but he wouldn't stop yelling. So, I told Destiny to just wait in my car with me while the officers figured out what they wanted us to do.

9. Destiny started to cry. She was extremely shaken by the car accident and the officer screaming at her.

10. The MCSD officer then came up to the my car and told Destiny he was going to arrest her. He never told us why. I begged the officer to just let me take her home. But he just kept cursing at me and screaming at me that "she is going to jail."

11. Then, the state trooper came over to the car and politely asked Destiny to get out of the car so he could take her statement. She was crying, but she was trying to explain that she didn't know whose directions to follow: the state trooper asking her to get out, or the MCSD officer screaming at her to stay in the car. The state trooper opened her door for her to get out and the MCSD officer ran around the car and grabbed her and arrested her.

12. I started to cry and beg the officer to let her stay.

13. Her husband John, who was in the car behind us, saw the MCSD officer handling Destiny in a rough way and came toward her to try to get the officer to calm down and explain he was hurting her.

14. The other MCSD deputies on the scene then tackled John. I watched them press John's head into the ground, one officer had his knee on John's neck. I was terrified.

15. The MCSD took Destiny and John to jail.

16. It took the entire next day to get Destiny out of jail. It took even longer to get John out.

17. The entire experience was surreal. None of my children have a criminal record. The officer arrested Destiny simply because she was crying and upset having watched everyone she loved almost get killed by a drunk driver.

18. I think the officer reacted in this way because my family is Black.

19. Over my 46 years I have witnessed the MCSD target and mistreat the Black community.

20. In my experience, they set up the roadblocks in Black neighborhoods at the beginning of the month, when people are receiving money.

21. I have been stopped at least six times in the last three years. I am frequently stopped at the exit off of the interstate on my way home from work. The exit is the one used by the Black residents of Canton.

22. On one occasion I was stopped at a roadblock. I gave the MCSD officer my license and proof of insurance. Even though my documents were in order, he told me to pull over. I waited on the side of the road for him for 20 minutes. Finally, he came over.



23. He asked me, "why does your tag say that – what does that mean?" I realized that he was upset because my license plate contains the letters "B," "A," and "D," my children's initials: Brian, Aaron, and Destiny. I use their initials on all sorts of things, like my email address.

24. He asked if it was some sort of gang affiliation. I was insulted. I am a mother of three grown children. I have worked at my job for over 20 years. I am certainly not a member of some gang. He only asked me that because I am Black.

25. I was scared by his anger as I tried to explain. Finally he allowed me to leave.

26. I was also stopped at a roadblock on the road up to my home. I found this strange, because I live on a small road in the County, where there is very little traffic. In fact, I am one of the few people who live on my street who isn't a senior citizen.

27. It makes me sad and afraid to watch them mistreat my family and my neighbors. During the scene on Highway 55, I asked the state trooper if he could do something. I asked him why this was happening. The state trooper, who was black, told me that we should all just be quiet. About the MCSD, he said to me, "we all know how they are."

I declare under penalty of perjury that the statements above are true and correct.



2-9-18

Date

# EXHIBIT 52

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF ARCHIE  
MCKAY**

I, Archie McKay, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Archie McKay. I am a 52 year old Black man. I have lived in Camden, Mississippi since I was six years old.
2. I live on a long road off of Highway 43. Only nine or ten families live on my entire six-mile road.
3. About 6 months ago, I was driving from my house, and I came upon an MCSD roadblock set up at the end of my street. Because of the way their cars were parked, I couldn't see the roadblock until I was already being stopped by the officer. The officer checked my license and let me go.

4. I don't know why the MCSD would set up a roadblock on my street. There is very little traffic because so few people drive in this rural area.

5. In April 2015, I was stopped at a roadblock at Highway 43 and Goodloe Road. The officer told me I had a warrant, arrested me, and took me to the Madison County Detention Center.

6. The arrest was a mistake, they actually had papers for my son for trespassing. However, I still had to go to jail and pay \$1,400 in order to leave. Because I was arrested on a Saturday, I had to stay in jail until Monday. Eventually, after going to court, a judge dismissed the trespassing charge.

Archie B. McKeever

2/4/18

Date

# EXHIBIT 53

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
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Plaintiffs,

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MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF ANTONIO  
MITCHELL**

I, Antonio Mitchell, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Antonio Mitchell. I am 29-year-old Black man. I live in the Magnolia Heights neighborhood in Flora, Mississippi. I have lived in Flora since 1997.
2. In the last three years I have been stopped at roadblocks at the entrance to my neighborhood about 10 times. I have been stopped three or four times in the last year.
3. When the MCSD sets up a roadblock, the officers park their cars – sometimes marked, sometimes unmarked – off to the side of the road. They rarely have their lights on, but when they do, they only turn on the lights in the back so it is impossible to see the cars until I am already up on the roadblock.

4. At the roadblocks, the deputies ask for license and insurance. They always talk to me as though I am a criminal. They immediately start asking about drugs in my car. At one roadblock, the deputy said to me, "I know you have something."

5. At two roadblocks in the last year, I had a passenger in my car at the roadblock. They asked that person for their license as well.

6. During at least half of the roadblocks I have been through, the officers have directed me to get out of my car, searched my person, and asked to search my car as well. When they search me, I have to take off any layers, they put their hands in my pockets, open my pants up, search around my genitals, and in my socks and shoes. All of this happens on the side of the road in my neighborhood. It is humiliating.

7. Every time they have asked to search my car, I have said no. However, the deputies have threatened to Taser me, pull me out of my car, and arrest me for my refusal to allow them to search. After being threatened, I just let them search. One time, a deputy ignored when I said "no," and just started searching my car anyway.

8. Two years ago, I was stopped and searched at a roadblock on my way home from the hospital where I had taken my infant son because he was very sick. I had just dropped him off back home when I came into the roadblock. I was covered in my son's vomit, I was distraught, and they insisted on searching me and my car anyway.

9. I believe they set up these roadblocks to harass and intimidate Black people. I have seen roadblocks set up where they stop every single Black person, and then waive the white people through. In the town of Flora, I have seen them stop Black pedestrians and drivers leaving stores, while they escort white drivers from the Blue Rooster (a restaurant frequented by white people) home. I have never seen a roadblock set up in the white communities.

10. When we have gatherings and birthday parties at the community center, the MCSD sets up a roadblock right outside on both directions, so everyone leaving the party has to pass through.

11. It is well known in my community when the MCSD sets up roadblocks. I am a licensed and insured driver, but on the evenings the MCSD is out, I try to not even leave my house. However, it isn't always possible to avoid their roadblocks. I am certain I will be stopped again. And, I think it is unfair that I have to take such precautions to avoid being mistreated by the MCSD.

12. I have also been stopped by the jump out patrol. Last year, I was driving my mother's car into town to get gas with two friends. As I was exiting my neighborhood, a red Dodge Charger with deeply tinted windows started following us. The car followed us for miles – all the way into town, waited while we got gas, and all the way back to my neighborhood.

13. As we drove back into Magnolia Heights, the Charger lights turned on. Two deputies jumped out of the car. They came up to the car and immediately started yelling at us and threatening us. They ran our licenses, but nothing came back. So, they called backup.

14. Another unmarked car and a marked car arrived. Then the MCSD told us they wanted permission to search the car. As with the roadblocks, I told them they did not have my consent. They pulled me and my two friends out of the car. They threatened to Taser us. They threatened to bring me to jail. I was never told why I was pulled over or why they wanted to search me. But, I felt forced to give consent, so I did. They then spent an hour searching my mom's car. When they were finished there were papers everywhere, floor mats thrown out on the ground – the car was a mess. They found nothing, so they drove away.



I declare under penalty of perjury that the statements above are true and correct.

Clara Mitchell

2, 5, 18

Date

# EXHIBIT 54

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
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Plaintiffs,

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MADISON COUNTY, MISSISSIPPI;  
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official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF EARNEST  
PATE, JR.**

I, Earnest Pate, Jr., declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Earnest Pate. I am a 46 year old black man. I live in Magnolia Heights in Flora. I grew up here, and I moved back 4 years ago.
2. On June 9, 2015, I was driving with my Black male friend around 3pm in the evening, when we came upon a roadblock on Livingston Vernon Rd.
3. The MCSD deputy initially asked the driver for his license and insurance and I thought we would then be free to continue on our way home. However, the officer then walked around the car to the passenger side window and asked me to get out of the car.
4. Once I got out of the car he began searching me. He patted down my body and stuck his hands in my pockets. He didn't find anything. Then he asked me for my license.
5. I was confused about why all this was happening. I wasn't driving the car. I certainly wasn't doing anything illegal. I didn't understand why he needed my license or how he could legally be demanding it and searching me.

6. But, the MCSD has a reputation for picking on Black people. People in the Black communities know that we have to do whatever they say. I complied with the officer even though it didn't feel right. I was afraid to do otherwise.
7. I tried to explain to the deputy that I was a law abiding citizen, a government employee, and that my relative was with the MCSD. He began cursing and yelling at me that he didn't care.
8. He ran my license and told me I had a warrant for a bad check. He taunted me and laughed at me and told me he was looking forward to taking me to jail.
9. The check was my ex-wife's, it had her signature on it.
10. More recently, in fall 2017, I had a very stressful experience where an MCSD officer in a marked car followed me close on my car for miles as I drove to work. He followed me all the way onto the property of my job.
11. I told my supervisor about it, and he told me "that's just how they are."
12. The MCSD targets the Black community in Flora. They set up roadblocks and mistreat Black people. I believe that I was treated with such disrespect at the roadblock where I was arrested because I am Black. In fact, I believe they only asked for my license – even though I was a passenger – because I am black.

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I declare under penalty of perjury that the statements above are true and correct.



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2/5/18  
Date

# EXHIBIT 55

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
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BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
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MADISON COUNTY, MISSISSIPPI;  
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official capacity; and MADISON COUNTY  
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through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF DELORES  
SMITH**

I, Delores Smith, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

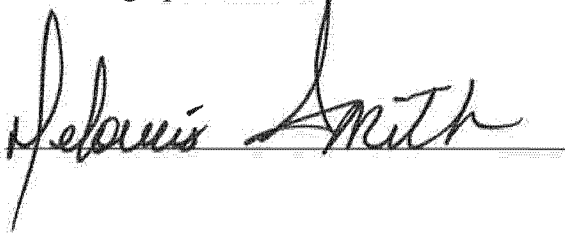
1. My name is Delores Smith. I am a 56 year old Black woman. I have lived in Camden nearly my whole life.
2. I believe that the Madison County Sheriff's Department targets the black community, particularly the young black men in the county, for harassment.
3. The MCSD officers are disrespectful, and often scary.
4. In 2015, I was driving in Canton, Mississippi, when a white MCSD officer in an undercover truck started driving very close to my car. Eventually he pulled me over.

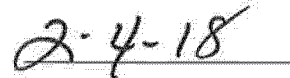
5. He came up to my window and began screaming and cursing at me for not pulling over sooner. I was shaken up for days.

6. I fear for my young sons. A year ago he came home and told me that he was driving and was pulled over by an MCSD officer. When he asked the officer why he was pulled over, the officer told him he fit a profile because he has dreadlocks and was wearing a hat.

7. The MCSD sets up roadblocks in my community. They pull off to the side of the road and stand in the road to pull people over.

8. Even though I am a licensed and insured driver, I still spend time trying to figure out where the MCSD is so I can avoid them. I try not to leave my house when I know they are out setting up roadblocks.



  
Date

# EXHIBIT 56



**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF QUINCY  
SMITH**

I, Quincy Smith, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Quincy Smith. I am 29 years old. I am a Black man. I grew up in Canton, Mississippi. I currently live in Philadelphia, Mississippi. I travel to Madison County to see my family and my children.
2. In the last three or four years, I have driven through as many as thirty roadblocks. The MCSD sets up roadblocks in the Black neighborhoods to target Black people
3. The MCSD parks off of the road and turns off all lights on their trucks. Then they stand in the road with flashlights.

4. They also set up roadblocks in the apartment complexes with their lights off. I have seen them sitting at the gates in Canton estates. When I lived at Marbella Estates, the MCSD set up roadblocks at both the entrance and the exit at the same time. I could not come or go from my home without passing through a roadblock.

5. At least half of the times I have driven through a roadblock, the MCSD officer has not even asked me for my license or insurance. He just asks for my social security number and runs it for warrants.

6. In 2014, I was stopped at a roadblock as I drove into my apartment in Marbella Estates. The officer didn't ask me for my license or social, he just asked me "where are the drugs?" I was frustrated that he was targeting me as a drug dealer. I don't do drugs, he only asked me that because I am black. I told him "I don't know where drugs are, you're the one looking for them." He directed me to get out of my car. I complied.

7. He told me I was being smart with him and that he was going to take me to jail. He never told me why I was being arrested. He didn't even know my name until I was taken the MCDC. Once I was at the MCSD, they discovered unpaid fines and booked me.

8. On May 3, 2015, I was stopped at roadblock on George Washington and Welsh. The MCSD had two trucks pulled over to the side. It was dark out and all the lights were off. As I drove up to them, the officers stepped into the road with flashlights.

9. The officer asked me for my social security number. I gave it to him. He arrested me for unpaid fines.

10. I tried to explain that the fines were my brother's and were under the wrong name. No one would listen to me or try to help me. I didn't want to miss work, so I just paid the fines and went home.

11. I was even stopped at a roadblock when I was on a bicycle. Around 2014, I was riding into Canton Estates. The MCSD had set up a roadblock at the entrance. The officer told me to get off my bike and demanded my social security number. I didn't want to give it to him, but I felt that if I said "no," they would arrest me for failure to comply. They arrested me for unpaid fines.

12. The MCSD also harasses Black people at traffic stops. Every time I have been a passenger in a car that is stopped, the MCSD has asked me for my license.

13. In early 2016, I was riding as a passenger when my friend was pulled over. The MCSD asked for my social security number. When nothing came back, he insisted I take a breathalyzer test. I do not know to this day why I had to give him my information and take a test if I wasn't driving.

14. Several years earlier, I was a passenger when my friend was stopped at a traffic stop. Both of us were asked for identification. The Black MCSD officer who pulled us over said to his white colleague that he was going to let us go. The white MCSD officer replied, "I'm not going to help a nigger out." Then, the white officer wrote my friend tickets.

15. I have also been stopped as many as fifteen times by the MCSD when I was on foot and been required to give my social security number.

16. Several years ago, I was walking three friends on Welsh Street when two MCSD cars pulled up on us. They demanded all of our social security numbers. We were afraid and felt like if we said no or walked away there would have been real trouble. After they ran our social security numbers and found nothing they put us up against the car and searched us. An officer patted me up and down, put his hands in my pockets, and searched inside my wallet.

17. I asked why they stopped us and searched us and they told me we looked like we were fixing to do something. I know that he meant we were just Black males walking. Just being Black makes us suspicious.

18. I have known to be afraid of the MCSD since I was a child. When I was about 11 years old Sheriff Tucker and several other deputies came to my apartment to arrest my step-father. I watched Tucker handcuff my step-father. Once he was in handcuffs Tucker punched him in the face and threw him on the ground. Tucker then turned to me and told me that this was part of the job, it was protocol, and I better not deal drugs.

I declare under penalty of perjury that the statements above are true and correct.

Quincy Smith

02/07/2018

Date

# EXHIBIT 57

EXHIBIT AA

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF JOHN  
SPANN**

I, JOHN SPANN, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is John Spann. I am a 27-year-old Black man. I live in Flowood, Mississippi.
2. For 3 years, I lived in Gluckstadt, a community in Madison County. I moved to Flowood in 2016, but many of my mother and friends still live in Gluckstadt. As a result, I travel to Madison County on a regular basis.
3. I take great care to appear respectable when I travel – often wearing dress clothes and bow tie. I also try to keep a low profile by driving a car that is modest and clean.

4. In the summer of 2016, I was stopped by the Madison County Sheriff's Department while I was driving home from visiting my grandmother in Gluckstadt. The stop lasted over 45 minutes. The two officers at the stop never explained to me why I was stopped and searched.

5. First, the officer asked me if I had been drinking. I responded that I had not and offered to take a sobriety test. The officer declined.

6. The officer then took my license and insurance and returned to his patrol car.

7. I told the officer that my insurance was on my back seat and offered to get it. He told me to stay where I was. Instead, without asking, his partner opened my back door and retrieved it himself.

8. The officer started to return to his car, but turned back to ask if I had a record of any kind like a warrant or priors. He then asked if I had any drugs or weapons. I responded that I did not. I could not understand what even prompted him to ask me. I believe he was profiling me because I am black.

9. When he returned to my car the officer demanded that I perform a search of my own car for him. I was extremely uncomfortable throughout the entire interaction. He directed me to uncover a plate of home-made food I was bringing home from my grandmother's house and show him what was on the plate. He also directed me to show him what was underneath a baseball cap in my passenger seat.

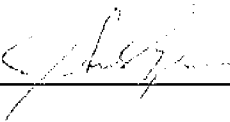
10. Finding nothing, he repeatedly asked me if I was drinking or had any weapons.

11. I do not believe the officer had any reason to stop me or instruct me to search my car.

12. When the stop was over the officer told me I was a “good sport” and drove away. He did not write a ticket for any traffic violation. I asked him why I was stopped and he told me I was “bumping the lines.” I know I was not.

13. I believe I was stopped for no reason and subjected to discriminatory treatment because my race. I am concerned that I will again be subjected to targeting and discrimination by the MCSD on the basis of my race while traveling in Madison County in the future.

I declare under penalty of perjury that the statements above are true and correct.

  
\_\_\_\_\_

10/22/2017

Date



# EXHIBIT 58

EXHIBIT BB

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF TERRANCE  
THOMPSON**

I, Terrance Thompson, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Terrance Thompson. I am a 24-year-old Black man. I have lived in Canton, Mississippi for most of my life.
2. In January 2017, I was walking with my friend Steven Smith. We were both stopped by three plainclothes MCSD deputies at a "checkpoint" at the entrance to the predominantly-Black affordable housing complex, Canton Estates, where Mr. Smith lives.

3. The officers were standing right at the gate at the entrance to Canton Estates. Their cars were parked inside of the gates. They appeared to be conducting a roadblock. They were stopping and checking every car as it drove in.

4. It was a cold night, so we were walking with our hands in our pockets. The officers demanded we take our hands out and we complied. At that point, I hoped that we would just pass through.

5. Instead, the officers began to search us. They did not tell us why. Prior to searching me, the deputy asked whether either I was carrying a weapon. I told them I was carrying an appropriately registered handgun that I had a license to use. I also told the deputies where they could find the handgun on my person.

6. One of the deputies retrieved the handgun, checked its serial number, confirmed that it belonged to me, and returned it to me.

7. The MCSD deputies also demanded to see my identification and ran my name for warrants. Finding nothing, I was told I was free to go.

8. However, a second deputy who was arresting my friend Steven for an outstanding warrant, asked the deputy why he wasn't arresting me. The deputy told him my gun was clean and appropriately registered, and that I had no outstanding warrants. But the second deputy instructed him to arrest me for concealed weapon. He did.

9. I asked the deputy for his badge information, but he refused to give it to me.

10. I was then taken to Madison County Detention Center, where I spent nearly a full day in jail. Because I didn't have the money to defend myself, I pleaded guilty to the charges.

11. I have also been stopped at least twice by the jump out patrol since 2014.

12. On one occasion, in 2015, I was walking with a Black male friend when an unmarked MCSD vehicle drove close to us. A plainclothes MCSD deputy rapidly exited the vehicle and stopped us both.

13. The MCSD deputy proceeded to search us both. I don't believe he had any legitimate reason to do so. He told me I was stopped because I looked like a "Black dope boy."

14. I had just received a refund of my college tuition, so I was carrying some cash in my pocket. When the deputy found the cash, he deputy demanded to know how I got it. I tried to explain to him about the refund.

15. He kept referring to me as a "Black dope boy" and told me he was going to "get some of that dope boy money."

16. He eventually released us.

17. On another occasion, in 2014, I was walking with a Black male friend near my house when an unmarked Tahoe pulled up on us. Two MCSD officers jumped out of the car and immediately put us in handcuffs.

18. Without any explanation, they began searching us. Finding nothing, they demanded I give them my social security number so they could run my name for warrants.

19. I complied and gave them the number. I was handcuffed. I did not feel that I had any choice.

20. When nothing came back on the warrant check, they allowed me to leave.

21. I am certain I will be stopped again at a checkpoint and by the jump out patrol. I feel that I, and the rest of the Black community, are targeted for unfair and discriminatory policing by the MCSD. When I am in Canton, I am always in danger of them jumping out on me or stopping me without reason.

I declare under penalty of perjury that the statements above are true and correct.



2-5-18

Date

# EXHIBIT 59

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF MONTREAL  
TILLMAN**

I, Montreal Tillman, declare the following under penalty of perjury pursuant to 28 U.S.C. §  
1746:

1. My name is Montreal Tillman. I am a 29-year-old Black man. I have lived in  
Madison County since 2008. I live in Canton.

2. I have seen more than twenty roadblocks in the time I have lived in Canton. The  
MCSD sets up roadblocks in the areas where Black people drive and walk. From my apartment I  
could see the MCSD set up roadblocks in Canton Estates and Joe Pritchard.

3. I have spent a great deal of time in the white neighborhood in Canton because it is where my fiancé lived. I have never seen a roadblock in the white neighborhood. I believe the MCSD sets them only in Black neighborhoods to target Black people.

4. In the past three years, I have driven through more than five roadblocks.

5. A typical roadblock is like the one I experienced one night, about three years ago. I went through a roadblock set up by MCSD in the industrial area of Canton. There were no blue lights on. I realized I was at a roadblock when a deputy jumped out at me with a flashlight. He waved the flashlight for me to pull over. He ran my license and checked my insurance and let me go.

6. On two occasions in the last three years, I was a passenger in a car that went through a roadblock.

7. On the first occasion, I was on my way work. The MCSD officer asked for my identification and ran my license. Nothing came back. Then, for no reason at all, he asked me “where are the drugs?” I told him there are none and he let us go.

8. The second time, I was coming home from work. There were no lights on at the roadblock. The driver and I didn’t see the roadblock until an officer stepped out in the street with his flashlight. Again the officer asked for my license. I complied.

9. The officer ran my license and found nothing. He then returned to the car and asked me to get out so he could search me. I felt scared. I did not feel like I could say no.

10. I got out of the car and patted me down, and went into my pockets. He also searched the entire car. He kept asking whether there was anything illegal. He found nothing and he let us leave.



11. I do not understand why the MCSD asked for my license when I was not driving. The first time, I even asked the officer why he was asking for my license if I was the passenger. He told me he needed to identify me to check for warrants.

12. The MCSD has even stopped me and asked for my license when I was walking.

13. On one occasion, in 2015, I was walking home to Joe Pritchard. The MCSD officer who stopped me was driving in an unmarked vehicle. At first he started shouting at me through his window to stop walking. Then he jumped out of his car. I was afraid. My heart was pounding.

14. He asked me who I was, where I was going, or if I had any illegal drugs or warrants. He asked for my license. I felt like I had to give it to him. He ran my name and nothing came back.

15. Then he told me to put my hands on the back of his truck so he could search me. He patted down my entire body and checked the insides of my pockets. I was right outside my house in my own neighborhood. I was, and still am, incredibly embarrassed. I was treated like a criminal in front of my friends and neighbors.

16. After about ten or fifteen minutes, he let go.

17. On another occasion, in 2015, I was walking to on Barfield Street in Canton, Mississippi. The neighborhood was a white neighborhood where my fiancé was living.

18. An MCSD officer saw me walking and jumped out of the car. He started asking me what I was doing in that neighborhood and who I knew in that neighborhood. I tried to explain that I was walking to my fiancé's house. But, he was extremely aggressive. He acted mad that I would be in that neighborhood. He insisted he had never seen me there before. He asked me again who I knew there.

19. After questioning me for about five minutes he asked for my license. After being interrogated by an angry officer, I knew I had to give it to him. He ran it, found nothing, and then went back to asking me more questions. He asked me whether I plan on coming around all the time and whether I have drugs or weapons.

20. Then, he told me to put my hands on the back of the car and he searched me. He humiliated me in plain view of everyone. He found nothing and let me go.

21. I feel like he targeted me because I was a Black person in a white neighborhood and that meant I must be up to no good or doing something illegal. It made me feel angry, stressed, and mostly sad, that I somehow didn't belong because of what I look like.

22. I have been mistreated by the MCSD at even the most routine traffic stops. In 2014, an MCSD officer pulled me over after I made a left turn at a stop sign on King Ranch Road. I had fully stopped, looked both ways, and decided it was safe to make the turn.

23. Rather than writing me a ticket, the MCSD officer escalated the situation. I asked the officer why he had stopped me, and he told me to "shut the fuck up." He told me that if he had "not taken anger management classes, [he] would drag my black ass up and down the street."

24. He asked me whether I had drugs in the car. I told him I did not. He asked if he could search the car. Again, I felt required to give my consent, so I told him he could. He directed my then girlfriend to step out of the vehicle, searched me, and searched my car.

25. He found nothing. It wasn't until he gave me the ticket for careless driving that he told me he stopped me because I made the left turn too fast.

26. The officer made it clear from the very words that he said the he was stopping me and harassing me because I am black.

I declare under penalty of perjury that the statements above are true and correct.

Montreal Gillman

Feb-5-18

Date